



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

1 CHRISTOPHER CHIOU
2 Acting United States Attorney
3 Nevada Bar Number 14853
4 EDWARD G. VERONDA
5 Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: Edward.G.Veronda@usdoj.gov
Attorneys for the United States of America

FILED.

DATED: 4:14 pm, March 21, 2022

U.S. MAGISTRATE JUDGE

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

Case No. 2:22-mj- 00214-DJA

10 vs.

APPLICATION TO SEAL

11 MARTEL RIVERA JR.,

12 Defendant.

13 COMES NOW the United States of America, by and through Christopher Chiou, Acting
14 United States Attorney, and Edward G. Veronda, Assistant United States Attorney, respectfully
15 moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's
16 Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another
17 Court of competent jurisdiction, shall order otherwise.

18 In this case, an order sealing the Complaint would be appropriate because the Defendant has
19 not yet been arrested, and the existence of this investigation is neither public nor known to all of the
20 targets of the investigation, and its disclosure may alert the Defendant of a pending arrest.
21 Accordingly, there is reason to believe that the disclosure of the information contained within the
22 Complaint will jeopardize the investigation, including by giving the Defendant an opportunity to flee
23 or continue flight from prosecution, or destroy or tamper with evidence.

1 The Government further submits that it is necessary for the Complaint to be sealed in light of
2 the fact that the Government Accordingly, there is reason to believe that notification of the existence
3 of complaint will seriously jeopardize the investigation, as noted previously, and would likely place
4 law enforcement at higher risk of confrontation when securing the arrest of the targets.

5 DATED this 21st day of March, 2022.

Respectfully submitted,
CHRISTOPHER CHIOU
United States Attorney

Edward G. Veronda
EDWARD G. VERONDA
Assistant United States Attorney

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2 FILED.
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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

DATED: 4:15 pm, March 21, 2022

U.S. MAGISTRATE JUDGE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 Case No. 2:22-mj- 00214-DJA

13 vs.

14 MARTEL RIVERA JR.,

15 Defendant.

16 **ORDER TO SEAL**

17 Based on the pending Application of the Government, and good cause appearing therefor, IT

18 IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
19 Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

20 DATED this 21st day of March, 2022.



A handwritten signature in blue ink, appearing to read "Daniel J. Albregts".

21 HONORABLE DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE